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February 28, 2011

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254 A)
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: 2010 Export Annual Report
Valero Refining – Texas, L.P. - Texas City Refinery
Industrial Solid Waste Registration No. 30011
EPA ID No. TXD000792937
TCEQ Regulated Entity Number: RN100238385
TCEQ Customer Reference Number: CN600127468

Dear Administrator:

Valero Refining – Texas, L.P. (Valero) is submitting this Annual Report for the 2010 calendar year for hazardous waste that was exported to foreign countries for metals reclamation from the Valero Texas City Refinery.

This report has been prepared in accordance with the requirements of 40 CFR §262.87.

(a)(1) The EPA identification number, name, and mailing and site address of the notifier filing the report:

EPA Id No.: TXD000792937
Name: Valero Refining – Texas, L.P., Texas City Refinery
Mailing: P.O. Box 3429
Address: Texas City, TX 77592
Site Address: 1301 Loop 197 South @ 14th St.
Texas City, TX 77590

(a)(2) The calendar year covered by the report: 2010

(a)(3) The name and site address of each final recovery facility:

Name: Union Corporation
Site Address: #548 Okmyoung-Ri, Daesong-Myon,
Nam-Gu, Pohang-City,
Kyungsanbuk-Do, South Korea



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OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL



7010 0780 0001 7711 5533



VALERO REFINING COMPANY - TEXAS
Post Office Box 3429 • Texas City, Texas 77592-3429

EPA - Office of Federal Activities
International Compl. Assurance (2254A)
Office of Enforcement & Compliance
1200 Pennsylvania Ave., NW
Washington, DC 20460

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Scott



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(a)(4) By final recovery facility, for each hazardous waste exported, a description of the hazardous waste, the EPA hazardous waste number (from 40 CFR part 261, subpart C or D), designation of waste type(s) from OECD waste list and applicable waste code from the OECD lists, DOT hazard class, the name and US EPA ID number (where applicable) for each transporter used, the total amount of waste shipped pursuant to this Subpart, and number of shipments pursuant to each notification:

Recovery Facility:	Union Corporation
Hazardous Waste Description:	R-14 NHT Hydrotreating Catalyst
EPA Hazardous Waste No.:	K171
OECD Waste Type:	Spent Catalyst Excluding Liquids used as Catalyst, Transition Metals (Nickel and Molybdenum)
OECD Waste Code:	B1120
DOT Hazard Class:	4.2
Transporter Name:	Jetco Delivery
Transporter U.S. EPA ID No.:	TXR000077976
Amount of Waste Shipped:	36,490 Lbs.
Number of Shipments:	1 shipment

(a)(5) In even numbered years, for each hazardous waste exported, except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, and except for hazardous waste for which information was already provided pursuant to §262.41:

(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated; and

The *Source Reduction Waste Minimization Plan 2008-2012* Executive Summary can be found in Attachment I.

(ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:

Valero Texas City Refinery continues to implement provisions of the *Source Reduction Waste Minimization Plan 2008-2012*. As required by that plan and associated reporting requirements, the annual progress report on source reduction and waste minimization activities will be submitted by July 1, 2011 to the Texas Commission on Environmental Quality and will be available upon request.

(a)(6) A certification signed by the primary exporter:

See Attachment II.

OECA – EPA
February 28, 2011
Page 3 of 3

Should you have any questions or require additional information, please call me at (409) 948-7215 or via e-mail at gino.paganucci@valero.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gino Paganucci". The signature is fluid and cursive, with the first name "Gino" written in a larger, more prominent script than the last name "Paganucci".

Gino Paganucci
Staff Environmental Engineer

Enclosures

cc: HS&E Library File: SW-03-01 (2011 Export Annual Report)

ATTACHMENT I

SOURCE REDUCTION WASTE MINIMIZATION PLAN 2008-2012

EXECUTIVE SUMMARY



TEXAS CITY REFINERY • Valero Refining - Texas, L.P. • Post Office Box 3429 • Texas City, Texas 77592-3429 • Telephone (409) 945-4451

U.S. Certified Mail No. 7006 2150 0005 7219 3934

July 16, 2008

Texas Commission on Environmental Quality
Pollution Prevention & Education Section (MC 112)
PO Box 13087
Austin, TX 78711-3087

Re: Revision to the Source Reduction/Waste Minimization Plan – Executive Summary
Valero Refining-Texas, L.P.
Texas City Refinery, Galveston County
Solid Waste Registration No. 30011
Regulated Entity No. RN100238385
Customer Reference No. CN600127468

Dear Sir or Madam:

Valero Refining – Texas, L.P. (Valero) is submitting the revised Source Reduction/Waste Minimization Plan - Executive Summary for years 2008 through 2012 for its Texas City Refinery. Valero is submitting this revision after making minor modifications to Source Reduction/Waste Minimization Plan.

If you have any questions, please contact me at (409) 948-7215.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Gino Paganucci'.

Gino Paganucci
Staff Environmental Engineer

Enclosure

cc: HS&E Library File SW-03-05

**Source Reduction and Waste
Minimization Plan for Reduction of
Hazardous Wastes and TRI
Compounds**

*Valero Refining – Texas, L.P.
Texas City Refinery
Texas City, Texas*

5-Year Plan for Period 2008-2012

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**Pollution Prevention Plan
For Reduction of Hazardous Wastes and TRI Compound Releases
For The 5-Year Period January 1, 2008 through December 31, 2012**

EXECUTIVE SUMMARY

Description of Facility:

Company: Valero Refining – Texas, L.P.

Site: Texas City Refinery

Physical Address: Texas City Refinery
1301 Loop 197 South @ 14th St.
Texas City, TX 77590

Mailing Address: Texas City Refinery
P.O. Box 3429
Texas City, TX 77592-3429

Local Contact:

Mr. Leslie G. Rucker; Director, Health, Safety, & Environmental Affairs
409 948-7296
les.rucker@valero.com

Technical Contact:

Mr. Gino Paganucci; Staff Environmental Engineer
409-948-7215
gino.paganucci@valero.com

Valero Refining – Texas, L.P. (Valero) operates a petroleum refinery in Texas City, Texas, which processes crude oil into petroleum products. The unit operations include crude oil distillation, catalytic cracking, catalytic reforming, alkylation, isomerization, sulfur recovery, ROSE unit, hydrotreating, and delayed coker operations.

The Texas City Refinery operates under the following environmental permits and registrations:

- TCEQ Air Account: GB0073-P
- TCEQ Solid Waste Notice of Registration: 30011
- TPDES Wastewater Discharge Permit: 00449 (EPA ID No. TX0006009)
- EPA Hazardous Waste Generator Identification: TXD000792937
- TRI ID Number: 77592TXSCTLOOP1
- SIC Code: 2911
- NAICS Code: 324110

Hazardous Waste and TRI Constituents

The hazardous wastes generated at the refinery for reporting year 2007, and the volume of each, are presented in Table 1. The reportable TRI releases for the reporting year 2006 and the volume of each are presented in Table 2.

Prioritized List of Pollutants

The table below indicates a prioritized list of pollutants to be reduced.

Priority	Pollutants/Waste to be Reduced
1	Sour Crude Tank Bottoms (D001, D018, K169), Sump & Sewer Sludge (F037), API/DAF Sludge (K048, K051, F038), Gasoline Tank Bottoms (D018), Naptha Tank Bottoms (D001, D018)
2	Nitrate Compounds in wastewater effluent
3	Potassium Hydroxide (D002)
4	Sodium Hydroxide (D002)

Reduction Goals and Considerations

Valero has defined several specific and general goals for waste minimization in the Texas City Refinery. These goals are:

- Reduce the risk to human health and the environment,
- Reduce the cost of waste management, and
- Reduce the potential liability of waste management methods.

Valero's Waste Minimization goal for the priority 1 streams in the table above is 500 ton/yr (2,500 tons for 5 yr plan). The goal for each of the priority 1 waste streams is a weighted average based on the waste stream's 2007 baseline quantity. The goal for the priority 2 waste stream is to recycle approximately 250 gpm of wastewater effluent (containing nitrate compounds) to the refinery's firewater storage system. The goal for the priority 3 and 4 waste streams (spent caustic and spent KOH) is to recycle 100% each year by offsite regeneration and reuse processes. Approximately 1662 tons of spent caustic and 560 tons of spent KOH were recycled in 2007.

Waste Minimization and Source Reduction Projects

Valero has considered the potential for off-site exposure resulting from releases of wastes generated at the refinery. The waste minimization projects selected for implementation will reduce the quantity of hazardous waste sent off-site for treatment and disposal, and reduce associated quantities of TRI reportable chemicals sent to landfills and treatment facilities. These projects will also reduce the quantity of reportable chemicals in wastewater discharges.

The projects included in this Plan will reduce overall risks to human health and the environment. A list of source reduction and waste minimization projects planned for the period 2008-2012 and associated schedule for implementation are included in Table 3.


The schedule for future reduction goals is 500 tons per year for wastes recycled in the delayed coker unit, 250 gpm of wastewater recycled to the firewater system, and 100% recycle of KOH and spent caustic for each of the 5 years included in this plan.

For the waste minimization projects included in this plan, Valero has considered the potential for pollutants from the waste minimization activities to be shifted to another medium. Emission controls are used in the coker to limit emissions of waste constituents recycled in the coker. Carbon canisters are used to control VOC emissions on the frac tank and permanent tank (i.e., feed tank) in the Coker Unit. The collection drums for KOH and NaOH in the Alky and Treathers Units are closed systems that vent to the flare. All recycling activities for KOH and NaOH occur offsite. The wastewater that is recycled to the firewater system and reused during refinery operations is routed to the wastewater treatment system.

Plan Certification

I certify that this Pollution Prevention Plan has been completed to meet the specific requirements of 30 TAC Sections 335.471-335.480, and that the information provided herein is correct and complete.

This document also certifies that I have the authority to commit the corporate resources necessary to implement this plan.

A handwritten signature in black ink, appearing to read "Leslie G. Rucker", is written over a horizontal line.

Leslie G. Rucker
Director,
Health, Safety, & Environmental Affairs
Valero Refining – Texas, L.P.
Texas City Refinery

TABLES

TABLE 1

Hazardous Waste Data
Valero Refining - Texas, L.P.
Texas City Refinery
Tons Per Year (except where noted)

Waste Information						Estimated SR/WM Reduction During 5 Year Plan (Tons)				2007 Baseline (Tons)
Waste	EPA Waste Codes	TCEQ Waste Code	Activity	Mgt Method	Disposal Facility	Project	SR	WM	Total SR+WM	
GOHT (previously Residfiner Catalyst)	K172	5152393H	Turnaround/ Maintenance	010	Union Corporation	See Note 1				2,123.82
Spent Caustic	D002	0303109H	Turnaround/ Maintenance	Recycled	Merichem	See Note 2		8,313.10	8,313.10	1,662.62
Sour Crude Tank Bottoms	D001, D018, K169	0820603H	Turnaround/ Maintenance	039	Duratherm	DCU, See Note 3		1,342.59	1,342.59	268.30
Sump & Sewer Sludge	F037	0085603H	Wastewater Collection	141, 039, 040	Duratherm, Veolia P.A.	DCU, See Note 3		1,016.35	1,016.35	203.11
Activated Charcoal	D018	5402404H	Turnaround/ Maintenance	010	Duratherm	See Note 1				153.84
Tank 78 Wastewater Sludge	F037	0051409H	Turnaround/ Maintenance	040	Veolia P.A.	See Note 1				33.72
Heat Exchanger Bundle Sludge	D018, K050	3720603H	Turnaround/ Maintenance	040	Veolia P.A.	See Note 1				20.65
Spent Pt Catalyst; Reformer	D018	5701393H	Turnaround/ Maintenance	010	Multimetco, Sabin Metals West Corporation, Cat Rec Of La	See Note 1				19.11
Ni/Mo Catalyst; Reformer	D001	4953393H	Turnaround/ Maintenance	010	Cat Rec Of LA	See Note 1				16.57
API/DAF Sludge	K048, K051, F038	0011409H	Wastewater Treatment	039	Duratherm	DCU, See Note 3		76.86	76.86	15.36
ASO/KOH Tank Sludge	D002	3813319H	Turnaround/ Maintenance	040	Veolia P.A.	See Note 1				14.21
Co/Mo Catalyst; Reformer	D001, D018, K171	4954393H	Turnaround/ Maintenance	039, 040	Duratherm, Veolia P.A.	See Note 1				13.23
Gasoline Tank Bottoms	D018	0910603H	Turnaround/ Maintenance	039	Duratherm	DCU, See Note 3		61.70	61.70	12.33
Contaminated Debris	F037	3743319H	Turnaround/ Maintenance	040, 132	Chemwaste Carlyss, VEOLIA P.A.	See Note 1				11.76
Contaminated Media	K169	3767319H	Turnaround/ Maintenance	132	Chemwaste Carlyss	See Note 1				10.30
Petroleum Coke	D018	4507409H	Turnaround/ Maintenance	039	Duratherm	See Note 1				8.11
Contaminated Media	K050	3777319H	Turnaround/ Maintenance	132	Chemwaste Carlyss	See Note 1				5.53

TABLE 1
Hazardous Waste Data
Valero Refining - Texas, L.P.
Texas City Refinery
Tons Per Year (except where noted)

Waste Information						Estimated SR/WM Reduction During 5 Year Plan (Tons)				2007 Baseline (Tons)
Waste	EPA Waste Codes	TCEQ Waste Code	Activity	Mgt Method	Disposal Facility	Project	SR	WM	Total SR+WM	
Computer Monitors	D008	3758319H	Other	141	Veolia P.A.	See Note 1				4.84
Residual Catalyst Contaminated Debris	K172	3760319H	Turnaround/ Maintenance	141	Chemwaste Carlyss	See Note 1				3.66
Alkylate Tank Bottoms	D001, D018	0900603H	Turnaround/ Maintenance	039	Duratherm	See Note 1				2.85
Residfiner Paint Waste	D001, F003, F005	3724604H	Turnaround/ Maintenance	040	Veolia P.A.	See Note 1				2.60
Spent Lead Acid Batteries	D002, D008	1650309H	Turnaround/ Maintenance		Veolia P.A.	See Note 1				2.28
Naptha Tank Bottoms	D001, D018	0953603H	Turnaround/ Maintenance	040	Veolia P.A.	DCU, See Note 3		2.50	2.50	0.50
Ammonia Vials	D002, D009	3741110H	Wastewater Treatment	141	Veolia P.A.	See Note 1				0.45
API/DAF Contaminated Debris	K048, K051, F038	2705489H	Wastewater Treatment	040	Veolia P.A.	See Note 1				0.43
Contaminated Media	K171	3770319H	Turnaround/ Maintenance	040	Veolia P.A.	See Note 1				0.23
Solvent Contaminated Rags	F002	3771319H	Turnaround/ Maintenance	040	Veolia P.A.	See Note 1				0.09
Waste Aerosols	D001	3775219H	Turnaround/ Maintenance	040	Veolia P.A.	See Note 1				0.06
Total									10,813	4,611

Notes:

1. No SR/WM activities planned. Quantities of wastes generated by turnaround/maintenance activities varies significantly each year. These wastes will be evaluated annually for SR/WM opportunities.
2. Spent Caustic (0303109H) and spent KOH is regenerated offsite for reuse. Valero's WM goal is based on 2007 baseline quantity and 100% recycled each year.
3. Valero's Waste Minimization goal for all DCU streams is 500 Ton/yr (2,500 T for 5 yr plan). The goal for each of the 5 major DCU waste streams is a weighted average based on the waste stream's 2007 baseline quantity.

TABLE 2

Toxic Release Inventory (TRI) Data
Valero Refining - Texas, L.P.
Texas City Refinery
Tons Per Year (except where noted)

SARA Chemical and Activities		Estimated SR/WM Reduction During 5 Year Plan (Tons)				Baseline Releases 2006 (Tons) ¹		
Compound	Activity	Project	SR - Releases	WM - Rel & Transfers	Total WM & SR	Baseline Releases	Baseline Transfers	Total Releases & Transfers
Nitrate Compounds	Wastewater collection	Firewater recycle, See Note 2				137.74	-	137.74
Propylene	Production processes	See Note 3				23.42	-	23.42
Ethylene	Production processes	See Note 3				19.56	-	19.56
Ammonia	Production processes, Wastewater system	See Note 3				11.68	2.69	14.37
Toluene	Production processes	See Note 3				10.91	0.06	10.97
n-Hexane	Production processes	See Note 3				9.96	0.02	9.98
Nickel Compounds	Production (catalyst)	See Note 3				0.09	7.83	7.92
Xylene (mixed)	Production processes	See Note 3				5.54	1.55	7.09
Polycyclic Aromatics	Production processes	See Note 3				4.67	1.92	6.59
Benzene	Production processes	See Note 3				4.70	0.01	4.71
Molybdenum Trioxide	Production processes, Wastewater system	See Note 3				1.48	3.13	4.61
Naphthalene	Production processes	See Note 3				3.53	0.57	4.10
Cobalt Compounds	Production (catalyst)	See Note 3				0.04	3.45	3.50
Methanol	Production processes, Wastewater system	See Note 3				2.54	0.07	2.60
Ethylbenzene	Production processes	See Note 3				2.55	0.03	2.58
Cyclohexane	Production processes	See Note 3				2.10	0.01	2.10
Chlorine	Production processes, Wastewater system	See Note 3				2.06	-	2.06
Sulfuric Acid	Production processes	See Note 3				1.68	-	1.68
Methyl-tert-butyl-Ether	Production processes	See Note 3				1.27	0.01	1.27
1,2,4 TMB	Production processes	See Note 3				1.08	0.15	1.22
Vanadium	Production (catalyst)	See Note 3				0.42	0.77	1.19
tert-Butyl Alcohol	Production processes, Wastewater system	See Note 3				0.99	0.10	1.09
Carbon Disulfide	Production processes	See Note 3				1.05	-	1.05

TABLE 2

Toxic Release Inventory (TRI) Data
Valero Refining - Texas, L.P.
Texas City Refinery
Tons Per Year (except where noted)

SARA Chemical and Activities		Estimated SR/WM Reduction During 5 Year Plan (Tons)				Baseline Releases 2006 (Tons) ¹		
Compound	Activity	Project	SR - Releases	WM - Rel & Transfers	Total WM & SR	Baseline Releases	Baseline Transfers	Total Releases & Transfers
Cresols	Production processes	See Note 3				0.81	0.11	0.92
Hydrogen Fluoride	Production processes	See Note 3				0.88	-	0.88
Lead Compounds	Production processes	See Note 3				0.0033	0.37	0.37
1,3, Butadiene	Production processes	See Note 3				0.36	-	0.36
Cyanide Compounds	Production processes	See Note 3				0.28	0.0038	0.28
Phenol	Production processes	See Note 3				0.09	0.13	0.22
Hydrogen Cyanide	Production processes	See Note 3				0.16	-	0.16
Tetrachloroethylene	Production processes	See Note 3				0.13	-	0.13
Benzo(G,H,I)perylene	Production processes	See Note 3				0.0004	0.13	0.13
Carbonyl Sulfide	Production processes	See Note 3				0.12	-	0.12
Cumene	Production processes	See Note 3				0.11	0.01	0.11
Hydrochloric Acid	Production processes	See Note 3				0.09	-	0.09
Mercury	Production processes	See Note 3				0.02	0.0009	0.02
Dioxin (gms)	Production processes	See Note 3				0.23	-	0.23
Total Releases						252	23	275

Notes:

1. Baseline data for 2007 was not available at the time the SR/WM Plan was developed.
2. The approximate quantity of wastewater recycled to the firewater system is 250 gpm.
3. No SR/WM activities planned. Releases are mainly associated with air emissions which are minimized by various emission control and air permitting conditions and fugitive monitoring programs (LDAR). Transfers are mainly associated with waste management activities; SR/WM for transfers are addressed in Waste Table. These releases and transfers will be evaluated annually for SR/WM opportunities.

TABLE 3

Source Reduction/Waste Minimization Projects
Valero Refining - Texas, L.P.
Texas City Refinery
Plan Period 2008-2012

Priority	Project Name	Project Description	Pollutants/Waste to be Reduced	Environmental or Human Health Risks or Benefits	Technical and Economic Considerations	Implementation Schedule	Awareness and/or Training Efforts
1	DCU	Process in the DCU A portion of wastewater effluent is used as supply in firewater storage system (approximately 250 gpm)	Sour Crude Tank Bottoms (D001, D018, K169), Sump & Sewer Sludge (F037), API/DAF Sludge (K048, K051, F038), Gasoline Tank Bottoms (D018), Naptha Tank Bottoms (D001, D018)	Will reduce the quantity of hazardous waste sent off-site for treatment and disposal, and reduce associated quantities of TRI reportable chemicals sent to landfills and treatment facilities.	DCU is technically feasible. Will reduce hazardous waste costs.	In operation	Current training program addresses many aspects of refinery operations, specific requirements of RCRA, EPCRA, and hazard communication requirements of OSHA
2	Firewater Recycle		Nitrate Compounds in wastewater effluent	Will reduce the quantity of reportable chemicals in wastewater discharge.	Technically feasible. Will reduce firewater makeup costs.	In operation	Current training program addresses many aspects of refinery operations, specific requirements of RCRA, EPCRA, and hazard communication requirements of OSHA
3	KOH Regeneration	Spent KOH is sent offsite and is regenerated for continued use.	Potassium Hydroxide (D002)	Will reduce the quantity of hazardous waste sent off-site for treatment and disposal	Technically feasible. Will reduce hazardous waste costs.	In operation	Current training program addresses many aspects of refinery operations, specific requirements of RCRA, EPCRA, and hazard communication requirements of OSHA
4	NaOH Regeneration	Spent NaOH is sent offsite and is regenerated for continued use.	Sodium Hydroxide (D002)	Will reduce the quantity of hazardous waste sent off-site for treatment and disposal	Technically feasible. Will reduce hazardous waste costs.	In operation	Current training program addresses many aspects of refinery operations, specific requirements of RCRA, EPCRA, and hazard communication requirements of OSHA

ATTACHMENT II

PRIMARY EXPORTER CERTIFICATION

Certification by Primary Exporter

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.



Leslie G. Rucker
Director, Health, Safety, & Environmental Affairs
Valero Refining – Texas, L.P.
Texas City Refinery

2-28-11

Date